# THE OFFICE OF REGULATORY STAFF DIRECT TESTIMONY AND EXHIBITS

**OF** 

**CHRISTINA L. SEALE** 

March 8, 2011



**DOCKET NO. 2011-2-E** 

ANNUAL REVIEW OF BASE RATES FOR FUEL COSTS SOUTH CAROLINA ELECTRIC AND GAS COMPANY

1		DIRECT TESTIMONY AND EXHIBITS OF
2		CHRISTINA L. SEALE
3		ON BEHALF OF
4		THE SOUTH CAROLINA OFFICE OF REGULATORY STAFF
5		<b>DOCKET NO. 2011-2-E</b>
6		IN RE: ANNUAL REVIEW OF BASE RATES FOR FUEL COSTS OF
7		SOUTH CAROLINA ELECTRIC & GAS COMPANY
8		
9	Q.	PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND
10		OCCUPATION.
11	A.	My name is Christina L. Seale. My business address is 1401 Main Street,
12		Suite 900, Columbia, South Carolina, 29201. I am employed by the South
13		Carolina Office of Regulatory Staff ("ORS") in the Audit Department, as an
14		Auditor.
15	Q.	PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND
16		EXPERIENCE.
17	A.	I received a Bachelor of Science Degree with a major in accounting and a
18		minor in computer systems and applications from Columbia College in 2000.
19		From 2000 to 2004, I was employed by the South Carolina Office of the State
20		Auditor. In that capacity, I performed agreed-upon procedures engagements and
21		statewide single audits of various state agencies in South Carolina. In January
22		2005, I began my employment as an auditor with ORS and have participated in

numerous rate cases and various other filings for electric, telephone, water and
wastewater utilities.

### 3 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS

#### PROCEEDING?

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A. The purpose of my testimony is to present the results of ORS Audit Staff's examination of the books and records pertaining to South Carolina Electric & Gas Company's ("the Company" or "SCE&G") Fuel Adjustment Clause ("FAC") operation. The current review period consists of actual information from January 2010 through December 2010 and the Company's estimated calculations for the months of January through April 2011 (Docket No. 2011-2-E). The findings of the examination for the actual review period are set forth below and in the exhibits attached to this testimony.

#### Q. WHAT WAS THE PURPOSE OF THIS EXAMINATION?

The purpose of this examination was to determine whether the Company's accounting practices in computing and applying the monthly Fuel Adjustment Clause have been in compliance with S.C. Code Ann. §58-27-865 (Supp. 2010). To accomplish this task, ORS examined the components associated with the operation of the clause.

#### Q. WHAT WAS THE SCOPE OF ORS'S EXAMINATION?

ORS Audit Staff examined and verified the monthly fuel adjustment factor calculations and the fuel recovery balances recorded in the Company's books and records. The current fuel examination covered the actual period of January through December 2010 ("actual review period") and four (4) estimated

1 months from January to April 2011. ORS Audit Staff did not examine the months 2 of January, February, March, and April 2011 since these were Company estimated 3 figures. The Audit Department's examination consisted of: 4 1. Analyzing the Fuel Stock Account- Account #151 5 ORS's analysis of the Fuel Stock Account consisted of verifying receipts to 6 and issues from the fuel management system to the general ledger, examining 7 monthly fuel charges originating in fuel accounting, and ensuring that only 8 proper charges were entered in the Company's computation of fuel costs for 9 purposes of adjusting base rates for fuel costs. 10 2. Sampling Receipts to the Fuel Stock Account- Account #151 11 ORS's review of receipts to the Fuel Stock Account consisted of examining 12 and testing selected transactions which support additions to the account. Each 13 transaction examined was tested for mathematical accuracy and vouched to a corresponding waybill or truck bill, coal receiving report and freight study 14 15 detailed report. Each transaction was then verified by a corresponding fuel 16 management system payment voucher to prove payment of the correct amount 17 to the vendors. 18 3. Verifying Charges to Nuclear Fuel Expense- Account #518 19 ORS verified the expense amounts for nuclear fuel to the books and records for the actual review period to confirm the accuracy of these expenses to fuel 20 21 amortization schedules. 22

#### 4. Verifying Purchased and Interchange Power Fuel Costs

ORS verified the Company's Purchased and Interchange Power Fuel Costs, kilowatt-hour ("kWh") purchases and sales for the actual review period to various "Energy Received and Energy Delivered" summary reports, Purchases, Sales and Interchange Power schedules, and on a sample basis, to monthly invoices. ORS recomputed the Company's sales and purchases.

The Purchased and Interchange Power figures for the actual review period and the resultant over (under)-recovery monthly deferred fuel amounts for the period reflect calculations which conform to §58-27-865. This statute addresses fuel costs related to purchased power. Subsection (A)(2)(b) of this statute states that the total delivered cost of economy purchases, including (but not limited to) transmission charges, are included in Purchased Power Costs if those purchases are "less than the purchasing utility's avoided variable costs for the generation of an equivalent quantity of electric power." ORS applied this statute to the examined economic purchases along with the applicable avoided costs.

#### 5. Verifying kWh Sales

ORS verified total system kWh sales, as filed in the monthly fuel factor computation, to monthly Class/Rate Summary reports for the actual review period. The monthly kWh sales figures were then used to determine the fuel cost per kWh sold.

1 6. Recalculating the Fuel Adjustment Factors and Verifying the Deferred Fuel 2 Costs 3 ORS recalculated the fuel cost adjustment factors for the actual review period 4 utilizing information obtained from the Company's records. ORS verified the 5 total fuel costs for the actual review period to the Company's books and 6 records. In recalculating the monthly factors, ORS divided total fuel costs by 7 total system kWh sales to arrive at fuel costs per kWh sales. The base fuel cost 8 per kWh, included in the base rates, is then subtracted from the fuel cost per 9 kWh sales. The resulting figure represents the fuel cost adjustment above or 10 below the base rate per kWh sales. The South Carolina retail jurisdictional kWh deferrals were checked against the Company's records and the actual 11 12 deferred fuel costs for each month were verified to the Company's books and 13 records. 14 7. Recalculating the True-up for the Over (Under)-Recovered Fuel Costs 15 ORS analyzed and recomputed the cumulative over (under)-recovery of actual 16 base fuel costs for the period January 2010 through December 2010 of (\$76,013,131) and estimated over (under)-recovery through April 2011 of 17 (\$59,504,695). In addition, ORS recomputed the cumulative over (under)-18 19 recovery of actual environmental fuel costs for the period January 2010 20 through December 2010 of \$3,180,866 and estimated over (under)-recovery

through April 2011 of \$591,944.

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1		8. Details of the Company's Received Fuel Coal Costs
2		ORS prepared exhibits based upon information obtained from SCE&G's
3		books and records, and other sources, reflecting coal costs during the review
4		period. Specifically, these exhibits are as follows:
5		Audit Exhibit CLS-1: Total Received and Weighted Average Cost
6		Audit Exhibit CLS-2: Received Coal - Cost Per Ton (Per Plant)
7		Audit Exhibit CLS-3: Received Coal - Cost Per Ton Comparison
8	Q.	PLEASE EXPLAIN THE AUDIT EXHIBITS ATTACHED TO YOUR
9		TESTIMONY.
10	A.	ORS prepared audit exhibits from the Company's books and records,
11		reflecting fuel costs during the review period. Specifically, these exhibits include
12		the following:
13		AUDIT EXHIBIT CLS-1: TOTAL RECEIVED AND WEIGHTED
14		AVERAGE COST
15		In Audit Exhibit CLS-1, titled "Total Received and Weighted Average Cost,"
16		ORS reflects the total cost for the actual review period, for the three types of
17		fossil fuel: coal, #2 oil, and natural gas. ORS has also computed the weighted
18		average cost of each type of fuel.
19		AUDIT EXHIBIT CLS-2: RECEIVED COAL - COST PER TON (PER
20		PLANT)
21		This audit exhibit reflects the received cost per ton for coal at each plant during
22		the actual review period, in dollars per ton, including freight costs.

1	AUDIT EXHIBIT CLS-3: RECEIVED COAL - COST PER TON
2	COMPARISON
3	This audit exhibit reflects the received cost per ton for coal for each month from
4	January 2010 through December 2010 for SCE&G, Duke Energy Carolinas, and
5	Progress Energy Carolinas. For comparison purposes, ORS has shown the
6	invoice cost per ton, freight cost per ton, total cost per ton, and the cost per
7	MBTU.
8	AUDIT EXHIBIT CLS-4: BURNED COST – CONSUMED GENERATION
9	This audit exhibit reflects the per book cost of fuel burned for electric generation
10	during the actual review period. The burned cost of each class of fuel is shown
11	separately. These costs are used in the computation of the base fuel factor. The
12	SO <sub>2</sub> emission allowance expenses and other variable environmental costs, as
13	described in §58-27-865 (A)(1), are shown separately.
14	AUDIT EXHIBIT CLS-5: COST OF FUEL
15	This audit exhibit reflects ORS's computation of the total base fuel cost reflected
16	in the factor computation. There are three (3) components used in arriving at this
17	cost. These components are:
18	(1) Cost of Fuel Burned;
19	(2) Fuel Cost of Purchased and Interchange Power; and,
20	(3) Fuel Cost Recovered from Intersystem Sales.
21	Cost of Fuel Burned This amount is the total cost of all fossil and nuclear fuel
22	burned during the review period used in the base fuel component computation. A

1	detailed breakdown of coal, oil, gas and nuclear fuel can be seen in Audit Exhibit
2	CLS-4.
3	Fuel Cost of Purchased and Interchange Power This amount is the fuel cost of
4	SCE&G's monthly kWh purchases from other electric utilities or power
5	marketers.
6	Fuel Cost Recovered from Intersystem Sales This amount is the fuel cost
7	related to kWh's sold during the period to other electric utilities and/or power
8	marketers. Total fuel cost applicable to the base fuel component factor is
9	computed by adding the cost of fuel burned to purchased and interchange power
10	fuel costs. This amount is then reduced by fuel associated with intersystem sales.
11	AUDIT EXHIBIT CLS-6: COMPUTATION OF UNBILLED REVENUE
12	Shown in this audit exhibit are the actual fuel cost computations for January 2010
13	through December 2010 and SCE&G's estimate of fuel costs for January,
14	February, March and April 2011. The exhibit also shows the computation of the
15	cumulative over (under)-recovery balances and various adjustments for January
16	2010 through December 2010.
17	AUDIT EXHIBIT CLS-7: TOTAL ENVIRONMENTAL COSTS
18	Shown in this audit exhibit are the total environmental costs for January 2010
19	through December 2010 for sulfur dioxide (SO <sub>2</sub> ) and nitrogen oxides (NOx)
20	emission allowances, lime, limestone and ammonia.
21	AUDIT EXHIBIT CLS-8: DETAILS OF ENVIRONMENTAL COSTS
22	Shown in this audit exhibit is the actual fuel cost computation for January 2010
23	through December 2010 for sulfur dioxide (SO <sub>2</sub> ) and nitrogen oxides (NOx)

1		emission allowances, lime, limestone, ammonia, and SCE&G's estimate of						
2		variable environmental costs for January, February, March and April 2011.						
3	Q. WOULD YOU PLEASE EXPLAIN THE CUMULATIVE OVER (UNDER							
4		RECOVERY AMOUNT BROUGHT FORWARD IN AUDIT EXHIBIT						
5		CLS-6?						
6	A.	Yes. As reflected in Audit Exhibit CLS-6, ORS brought forward a						
7		cumulative (under)-recovery balance from December 2009 of (\$89,477,296). The						
8		Company's testimony {Rooks' EXHIBIT NO(AWR-1)} reflects an (under)-						
9		recovery balance brought forward from December 2009 of (\$89,916,955). The						
10		difference between the two balances is an over-recovery amount of \$439,659 that						
11		reflects the ORS's over-recovery adjustment from the prior review period, Docket						
12		No. 2010-2-E, which was not reflected on Rooks' EXHIBIT NO(AWR-1)						
13		until April 2010 in the fossil fuel figures.						
14	Q.	PLEASE ELABORATE ON ORS AUDIT STAFF'S COMPUTATION OF						
15		THE TRUE-UP OF OVER (UNDER)-RECOVERED FUEL COSTS.						
16	A.	ORS Audit Exhibit CLS-6, entitled "Computation of Unbilled Revenue,"						
17		provides details of ORS's calculation of the actual cumulative (under)-recovery						
18		balance through December 2010, and the estimated balance through April 2011.						
19		The cumulative (under)-recovery amount totaled (\$76,013,131) through						
20		December 2010. ORS then added SCE&G's estimated (under)-recovery of						
21		(\$3,371,261) for January 2011, estimated over-recoveries of \$12,703,736 for						
22		February 2011, \$11,630,640 for March 2011 and \$2,380,840 for April 2011. In						
23		addition, we included the monthly carrying costs approved in Docket No. 2010-2-						

1		E, the monthly calculation amount of \$1,583,583 for the Urquhart and Jasper
2		Fixed Capacity Charges, and the Company's estimated, on-going adjustments for
3		'cycle billing' Unbilled Fuel Cost Over (Under)-Recoveries, to arrive at a
4		cumulative (under)-recovery of (\$59,504,695) through April 2011. The
5		Company's testimony {Rooks' EXHIBIT NO(AWR-1)} in this docket reports
6		the cumulative (under)-recovery total through December 2010 as (\$76,704,245)
7		and through April 2011, the (under)-recovery totals (\$60,195,809). The
8		differences between ORS's and the Company's balances stem from an ORS over-
9		recovery adjustment made in December 2010. This adjustment is addressed later
10		in my testimony as ORS Adjustment (5B).
11	Q.	DID THE COMPANY MAKE ANY ADJUSTMENTS OR TRUE-UPS
12		DURING THE ACTUAL REVIEW PERIOD FOR THE BASE FUEL
13		COMPONENT?
14	A.	Yes. The Company made the following adjustments as shown on Audit
15		
16		Exhibit CLS-6:
10		Exhibit CLS-6:  Adjustment (1)- As described in PSC Docket No. 2010-2-E and in Company
17		
		Adjustment (1)- As described in PSC Docket No. 2010-2-E and in Company
17		Adjustment (1)- As described in PSC Docket No. 2010-2-E and in Company witness Allen Rooks' direct testimony from PSC Docket No. 2011-2-E, the
17 18		Adjustment (1)- As described in PSC Docket No. 2010-2-E and in Company witness Allen Rooks' direct testimony from PSC Docket No. 2011-2-E, the Company has a monthly carrying cost applied to the (under)-recovery balance,
17 18 19		Adjustment (1)- As described in PSC Docket No. 2010-2-E and in Company witness Allen Rooks' direct testimony from PSC Docket No. 2011-2-E, the Company has a monthly carrying cost applied to the (under)-recovery balance, shown as an (under)-recovery entry to the Deferred Fuel Account (Account #
17 18 19 20		Adjustment (1)- As described in PSC Docket No. 2010-2-E and in Company witness Allen Rooks' direct testimony from PSC Docket No. 2011-2-E, the Company has a monthly carrying cost applied to the (under)-recovery balance, shown as an (under)-recovery entry to the Deferred Fuel Account (Account # 182.3004). ORS examined and recomputed the carrying charges for these entries,

over-recovery amount of \$1,785,357. This amount consisted of the Urqunart
Plant and the Jasper Plant (Combined Cycle) monthly Fixed Capacity Charges of
\$673,417 and \$910,166, respectively, which are treated, in accordance with PSC
Orders No. 2003-38 and No. 2005-2, on a retail basis, as over-recovery Deferred
Fuel entries; and a NCEMC Sales cost allocation correction over-recovery
adjustment of \$201,774. In July 2010, the Company implemented new base rates
which became effective as of July 15, 2010 in accordance with Order No. 2010-
471, Docket No. 2009-489-E. As such, only half of the NCEMC Sales cost
allocation correction was included in July 2010. Beginning in August 2010, this
allocation adjustment was no longer included. Based on Docket No. 2008-2-E,
this cost allocation adjustment was to conclude when new base rates became
effective. ORS examined and recomputed the adjustments with no exceptions
noted.
Adjustment (3)- In various months of the review period, the Company had
several over (under)-recovery adjustments to the cumulative balances of the
Deferred Fuel Account (Account #182.3004). They are as follows:
(3A)- In January 2010, the Company overstated their fuel expenses billed from
Cogen South. The Company booked the over-recovery adjustment of \$183,552 in
February 2010.
(3B)- In March 2010, the Company booked an over-recovery adjustment of
\$17,388,364 relating to the use of Economic Impact Zone ("EIZ") Tax Credits for
a reduction to fuel costs in accordance with Order No. 2010-336, Docket No.
2010-2-E.

1 Also in March 2010, the Company booked an over-recovery adjustment 2 of \$2,361,802 for an estimated gas correction related to overstated gas costs. This 3 adjustment was reversed the following month and updated with the actual. 4 corrected amount. 5 The total of these over-recovery adjustments in March 2010 was 6 \$19,750,166. (3C)- In April 2010, the Company reversed the estimated gas correction discussed 7 8 in (3B) by booking it as an (under)-recovery adjustment of (\$2,361,802). Also, 9 the Company booked an (under)-recovery adjustment of (\$14,300) as a true-up relating to an impacted coal adjustment approved in PSC Docket No. 2010-2-E. 10 11 The total (under)-recovery adjustment in April was (\$2,376,102). (3D)- In September 2010, the Company made an over-recovery adjustment of 12 13 \$22,671 to reflect a correction to its prior month's coal costs due to a reduction in 14 coal expense for the McMeekin Plant. 15 (3E)- In December 2010, the Company made a reduction in coal expenses for the 16 Cope Plant to reflect a correction made for the prior month to an aerial survey 17 As a result of this reduction, an over-recovery adjustment of 18 \$1,834,540 was booked. ORS examined and recomputed all of the previous adjustments (3A-3E) with no exceptions noted. 19 20 Adjustment (4)- In the review period and the estimated and forecasted months, 21 the Company reflects an adjustment to account for the 'timing difference' 22 associated with unbilled revenue per electric sales not yet billed due to the regular 23 'cycle billing' process versus the fuel adjustment clause process which reflects all

of its unbilled fuel transactions (sales and costs) on a full monthly basis. ORS
examined and recomputed this adjustment with no exceptions noted.

### Q. DID ORS MAKE ANY ADJUSTMENTS OR TRUE-UPS DURING THE ACTUAL REVIEW PERIOD FOR THE BASE FUEL COMPONENT?

A. Yes. ORS made the following adjustments:

1	Ų.	WOULD YOU PLEASE EXPLAIN THE CUMULATIVE OVER (UNDER)-
2		RECOVERY BALANCE BROUGHT FORWARD IN AUDIT EXHIBIT
3		CLS-8?
4	A.	Yes. As reflected in Audit Exhibit CLS-8, ORS brought forward a
5		cumulative over-recovery balance from December 2009 of \$13,544,222. The
6		Company's testimony {Rooks' EXHIBIT NO(AWR-3)} reflects a cumulative
7		over-recovery balance brought forward from December 2009 of \$13,544,221.
8		The difference is due to rounding.
9	Q.	PLEASE ELABORATE ON ORS AUDIT STAFF'S COMPUTATION OF
10		THE TRUE-UP OF OVER (UNDER)-RECOVERED ENVIRONMENTAL
11		COSTS.
12	A.	Effective May 3, 2007, S.C. Code Ann. §58-27-865 was amended to
13		include, as components of fuel cost, "(a) the cost of ammonia, lime, limestone,
14		urea, dibasic acid, and catalysts consumed in reducing or treating emissions, and
15		(b) the cost of emission allowances, as used, including allowances for SO <sub>2</sub> , NOx,
16		mercury and particulates." Audit Exhibit CLS-8, entitled "Details of
17		Environmental Costs", provides the details needed to calculate the variable
18		environmental costs included in the fuel factor. In addition, effective May 3,
19		2007, SO <sub>2</sub> emission allowances were included in the environmental cost factor of
20		the FAC. Prior to that date, these costs had been included in the base fuel factor
21		under the FAC.
22		ORS Audit Exhibit CLS-8 provides data for ORS's cumulative
23		environmental cost over-recovery balance of \$3,180,866 through December 2010.

1		ORS then added SCE&G's monthly estimated (under)-recoveries for January
2		through April 2011; and included the Company's estimated on-going adjustments
3		for 'cycle billing' Unbilled Fuel Cost Over (Under)-Recoveries to arrive at a
4		cumulative over-recovery of \$591,944 through April 2011. The Company's
5		testimony {Rooks' EXHIBIT NO(AWR-3)} in this docket reports the
6		cumulative environmental cost over-recovery total through December 2010 as
7		\$3,159,478 and through April 2011 as \$570,557. The differences between ORS's
8		and the Company's balances stem from an ORS over-recovery adjustment made
9		in December 2010. This adjustment is addressed later in my testimony as ORS
10		Adjustment (8).
11	Q.	DID THE COMPANY MAKE ANY ADJUSTMENTS OR TRUE-UPS
12		DURING THE ACTUAL REVIEW PERIOD FOR THE
12 13		DURING THE ACTUAL REVIEW PERIOD FOR THE ENVIRONMENTAL COST COMPONENT?
	<b>A.</b>	
13	Α.	ENVIRONMENTAL COST COMPONENT?
13 14	<b>A.</b>	ENVIRONMENTAL COST COMPONENT?  Yes. The Company made the following adjustments as shown on Audit
13 14 15	<b>A.</b>	ENVIRONMENTAL COST COMPONENT?  Yes. The Company made the following adjustments as shown on Audit Exhibit CLS-8:
13 14 15 16	A.	ENVIRONMENTAL COST COMPONENT?  Yes. The Company made the following adjustments as shown on Audit Exhibit CLS-8:  Adjustment (6A)- In February 2010, the Company made an over-recovery
13 14 15 16 17	<b>A.</b>	Yes. The Company made the following adjustments as shown on Audit Exhibit CLS-8:  Adjustment (6A)- In February 2010, the Company made an over-recovery adjustment of \$3,444. This adjustment was made to account for changes in Cogen
13 14 15 16 17	<b>A.</b>	Yes. The Company made the following adjustments as shown on Audit Exhibit CLS-8:  Adjustment (6A)- In February 2010, the Company made an over-recovery adjustment of \$3,444. This adjustment was made to account for changes in Cogen South's lime expenses for the month of January 2010. ORS examined and
13 14 15 16 17 18	<b>A.</b>	Yes. The Company made the following adjustments as shown on Audit Exhibit CLS-8:  Adjustment (6A)- In February 2010, the Company made an over-recovery adjustment of \$3,444. This adjustment was made to account for changes in Cogen South's lime expenses for the month of January 2010. ORS examined and recomputed the adjustment with no exceptions noted.

1		from May through July 2010. ORS examined and recomputed the adjustment with
2		no exceptions noted.
3		Adjustment (7)- As described in Adjustment (4), the previously described "cycle
4		billing" methodology affects the recovery of environmental costs. The recurring
5		adjustments throughout the current review period are reflective of their respective
6		months. ORS examined and recomputed these adjustments with no exceptions
7		noted.
8	Q.	DID ORS MAKE ANY ADJUSTMENTS OR TRUE-UPS DURING THE
9		ACTUAL REVIEW PERIOD FOR THE ENVIRONMENTAL COST
10		COMPONENT?
11	A.	Yes. ORS made the following adjustment:
12		Adjustment (8)- During the examination of reagents, ORS noted that the
13		Company incorrectly accrued sales tax on limestone purchases in March through
14		July 2010 for the Williams Plant and on ammonia purchases in September
15		through October 2010 for the Jasper Plant. ORS reflected an over-recovery
16		adjustment of \$21,387, on a retail basis, in December 2010. This amount also
17		reflects the sole difference between ORS's and the Company's December 2010
18		cumulative over-recovery balance in environmental costs.
19	Q.	WHAT ARE THE COMBINED CUMULATIVE OVER (UNDER) -
20		RECOVERIES OF THE BASE FUEL COST AND ENVIRONMENTAL
21		COST COMPONENTS AS OF ACTUAL DECEMBER 2010 AND AS OF
22		ESTIMATED APRIL 2011?

1	<b>A.</b>	As of December 2010, based on a Base Fuel Cost Component
2		cumulative (under)-recovery balance of (\$76,013,131) and an Environmental Cost
3		Component cumulative over-recovery balance of \$3,180,866, the combined result
4		totals (\$72,832,265).
5		As of April 2011, based on a Base Fuel Cost Component cumulative
6		(under)-recovery balance of (\$59,504,695) and an Environmental Cost
7		Component cumulative over-recovery balance of \$591,944, the combined result
8		totals (\$58,912,751).
9	Q.	WHAT IS THE RESULT OF THE ORS AUDIT DEPARTMENT'S
10		EXAMINATION?
11	A.	Based on ORS Audit Staff's examination of the Company's books and
12		records, and its operation of the fuel cost recovery mechanism, the ORS Audit
13		Department is of the opinion that, subject to Adjustment (5) for the base fuel
14		component and Adjustment (8) for the environmental cost component, the
15		Company's books and records accurately reflect the fuel costs incurred by the
16		Company in accordance with previous Commission orders and with S.C. Code
17		Ann. §58-27-865.
18	Q.	DOES THIS CONCLUDE YOUR TESTIMONY?
19	Α.	Yes, it does.

## South Carolina Electric & Gas Company Total Received and Weighted Average Cost January 2010 - December 2010 Docket No. 2011-2-E

<u>Month</u>	Coal		<u>#2 Oil</u>		<u>Gas</u>		<b>Total Received Cost</b>
	Tons	\$	Gal	\$	MCF	\$	\$
Jan-10	522,777	58,588,637	1,488,690	3,303,877	2,871,495	24,640,373	86,532,887
Feb-10	306,226	33,460,792	565,751	1,230,278	3,346,801	22,500,131	57,191,201
Mar-10	529,020	54,502,111	285,070	642,682	1,498,752	9,522,910	64,667,703
Apr-10	398,667	43,916,298	209,446	510,981	1,267,727	6,053,598	50,480,877
May-10	359,033	40,544,930	28,829	187,701	4,353,117	22,436,130	63,168,761
Jun-10	361,649	40,236,520	429,704	971,223	5,095,574	29,637,670	70,845,413
Jul-10	380,189	40,330,878	162,553	346,190	5,353,101	30,084,504	70,761,572
Aug-10	433,392	47,746,255	170,595	411,968	5,722,244	31,043,933	79,202,156
Sep-10	455,665	50,523,200	163,260	367,678	5,275,911	25,498,074	76,388,952
Oct-10	476,541	51,770,175	68,360	166,376	4,185,816	17,824,841	69,761,392
Nov-10	499,102	53,171,308	370,692	901,506	2,294,858	11,220,501	65,293,315
Dec-10	418,242	44,551,412	640,337	1,647,450	4,231,556	25,997,976	72,196,838
Total	5,140,503	559,342,516	4,583,287	10,687,910	45,496,952	256,460,641	826,491,067
Weighted Average Cost	<u>\$</u>	108.81	<u>\$</u>	2.33		\$ 5.64	

#### South Carolina Electric & Gas Company Received Coal - Cost Per Ton (Per Plant) January 2010 - December 2010 Docket No. 2011-2-E

<u>Plant</u>	<u>Jan-10</u>	Feb-10	Mar-10	<u>Apr-10</u>	<u>May-10</u>	<u>Jun-10</u>	<u>Jul-10</u>	<u>Aug-10</u>	<u>Sep-10</u>	Oct-10	<u>Nov-10</u>	<u>Dec-10</u>
	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$	\$
Canadys	0.00	0.00	113.70	113.76	113.01	118.54	108.76	109.45	117.74	110.65	107.96	104.36
Cope	113.75	109.56	103.01	143.03	113.80	111.92	110.80	116.47	116.72	105.59	106.04	94.04
McMeekin	129.39	104.10	110.50	108.90	126.80	140.66	99.62	100.96	106.69	112.76	108.65	117.96
Urquhart	98.46	94.27	97.16	0.00	0.00	99.88	98.60	98.51	101.44	102.09	111.46	101.56
Wateree	109.89	113.19	101.78	115.44	107.82	110.80	121.30	122.65	110.56	110.11	111.16	117.68
Williams	109.60	103.66	97.36	101.06	105.39	99.32	93.02	90.33	107.51	99.34	96.64	103.34
Total System	112.07	109.27	103.02	110.16	112.93	111.26	106.08	110.17	110.88	108.64	106.53	106.52

### South Carolina Electric & Gas Company Received Coal - Cost Per Ton Comparison January 2010 - December 2010 Docket No. 2011-2-E

#### South Carolina Electric & Gas Company

<u>Month</u>	Invoice Cost <u>Per Ton</u>	Freight Cost Per Ton	Total Cost Per Ton	Cost Per MBTU
	\$	\$	\$	\$
Jan-10	84.82	27.25	112.07	4.4400
Feb-10	76.60	32.67	109.27	4.3300
Mar-10	73.30	29.72	103.02	4.0600
Apr-10	82.92	27.24	110.16	4.3600
May-10	80.52	32.41	112.93	4.4900
Jun-10	80.16	31.10	111.26	4.3900
Jul-10	74.52	31.56	106.08	4.2100
Aug-10	78.84	31.33	110.17	4.3800
Sep-10	77.99	32.89	110.88	4.3900
Oct-10	77.02	31.62	108.64	4.2900
Nov-10	75.67	30.86	106.53	4.2200
Dec-10	72.78	33.74	106.52	4.2100

#### **Duke Energy Carolinas**

<u>Month</u>	Invoice Cost Per Ton	Freight Cost Per Ton	Total Cost Per Ton	Cost Per MBTU
	\$	\$	\$	\$
Jan-10	68.18	22.79	90.97	3.7070
Feb-10	70.33	22.89	93.22	3.8175
Mar-10	64.65	23.97	88.62	3.6228
Apr-10	67.93	22.78	90.71	3.6804
May-10	67.83	22.35	90.18	3.6661
Jun-10	66.76	26.20	92.96	3.7828
Jul-10	69.65	25.35	95.00	3.8839
Aug-10	68.38	24.40	92.78	3.7502
Sep-10	67.82	25.98	93.80	3.7273
Oct-10	68.58	25.33	93.91	3.7961
Nov-10	67.81	26.22	94.03	3.7510
Dec-10	66.87	26.26	93.13	3.7994

### South Carolina Electric & Gas Company Received Coal - Cost Per Ton Comparison January 2010 - December 2010 Docket No. 2011-2-E

#### Carolina Power & Light Company d/b/a Progress Energy Carolinas, Inc.

<u>Month</u>	Invoice Cost Per Ton	Freight Cost Per Ton	Total Cost <a href="Per Ton">Per Ton</a>	Cost <u>Per MBTU</u>
	\$	\$	\$	\$
Jan-10	70.95	24.97	95.92	3.9043
Feb-10	70.65	22.65	93.30	3.8048
Mar-10	68.84	20.26	89.10	3.6632
Apr-10	59.30	24.61	83.91	3.4266
May-10	57.19	23.53	80.72	3.2202
Jun-10	58.02	23.69	81.71	3.3352
Jul-10	57.69	24.07	81.76	3.3368
Aug-10	57.60	24.83	82.43	3.3463
Sep-10	52.72	22.37	75.09	3.0691
Oct-10	56.53	22.80	79.33	3.2435
Nov-10	56.29	24.75	81.04	3.3175
Dec-10	54.84	24.63	79.47	3.2732

South Carolina Electric & Gas Company
Burned Cost - Consumed Generation
January 2010 - December 2010
Docket No. 2011-2-E

Used for Base Fuel Factor:	Fuel Factor:								Total Rurned
Month	<u>Coal</u>		#2 Oil		Gas		Nuclear		Cost
	€9	%	<b>↔</b>	%	<b>&amp;</b>	%	<b>∽</b>	%	<b>↔</b>
Jan-10	49,060,003	62.27%	1,581,937	2.01%	24,618,602	31.25%	3,524,299	4.47%	78,784,841
Feb-10	35,407,746	57.33%	782,711	1.27%	22,482,452	36.40%	3,087,460	2.00%	61,760,369
Mar-10	30,930,037	%98.69	295,822	0.67%	9,517,192	21.50%	3,527,390	7.97%	44,270,441
Apr-10	29,327,601	74.90%	372,323	0.95%	6,053,415	15.46%	3,403,532	8.69%	39,156,871
May-10	34,283,736	56.35%	603,060	0.99%	22,435,777	36.87%	3,523,959	2.79%	60,846,532
Jun-10	43,834,056	56.78%	345,050	0.45%	29,637,270	38.39%	3,380,371	4.38%	77,196,747
Jul-10	47,253,513	58.41%	247,762	0.31%	30,084,534	37.19%	3,309,239	4.09%	80,895,048
Aug-10	51,446,884	29.60%	344,570	0.40%	31,043,933	35.96%	3,482,882	4.04%	86,318,269
Sep-10	42,058,894	59.44%	109,614	0.16%	25,498,074	36.04%	3,087,518	4.36%	70,754,100
Oct-10	33,789,562	%68.09	352,494	0.64%	17,824,695	32.12%	3,524,356	6.35%	55,491,107
Nov-10	39,129,591	72.27%	382,881	0.71%	11,219,236	20.72%	3,413,724	6.30%	54,145,432
Dec-10	39,687,198	55.79%	1,938,058	2.73%	25,979,738	36.52%	3,526,336	4.96%	71,131,330
Totals	476,208,821	%66.09	7,356,282	0.94%	256,394,918	32.84%	32.84% 40,791,066	5.23%	780,751,087

#### South Carolina Electric & Gas Company Cost of Fuel January 2010 - December 2010 Docket No. 2011-2-E

<u>Month</u>	Cost of Fuel Burned	Fuel Costs of Purchased and Interchange Power	<u>Fuel Cost Recovered</u> <u>from Intersystem Sales</u>	Total Fuel Costs
	\$	\$	\$	\$
Jan-10	78,784,841	15,383,633	(4,015,368)	90,153,106
Feb-10	61,760,369	15,060,839	(2,695,032)	74,126,176
Mar-10	44,270,441	17,329,512	(1,153,830)	60,446,123
Apr-10	39,156,871	15,602,435	(1,376,104)	53,383,202
May-10	60,846,532	9,190,207	(2,209,755)	67,826,984
Jun-10	77,196,747	14,007,263	(4,299,543)	86,904,467
Jul-10	80,895,048	16,960,371	(3,736,771)	94,118,648
Aug-10	86,318,269	16,619,018	(4,135,519)	98,801,768
Sep-10	70,754,100	7,778,266	(2,338,737)	76,193,629
Oct-10	55,491,107	616,303	(1,698,434)	54,408,976
Nov-10	54,145,432	5,415,501	(2,133,966)	57,426,967
Dec-10	71,131,330	17,574,995	(4,464,319)	84,242,006
Totals	780,751,087	151,538,343	(34,257,378)	898,032,052

#### South Carolina Electric & Gas Company Computation of Unbilled Revenue January 2010 - April 2011 Docket No. 2011-2-E

			***************************************		ACTUAL-	nou pulă păriouse acotogoă an obs	***************************************	***************************************	***************************************
		January	February	March	April	May	June	July	August
	_	2010	2010	2010	2010	2010	2010	2010	2010
Fossil Fuel (\$)		75,260,542	58,672,909	40,743,051	35,753,339	57,322,573	73,816,376	77,585,809	82,835,387
Nuclear Fuel (\$)		3,524,299	3,087,460	3,527,390	3,403,532	3,523,959	3,380,371	3,309,239	3,482,882
Purchased & Interchange Power Fuel (\$)		15,383,633	15,060,839	17,329,512	15,602,435	9,190,207	14,007,263	16,960,371	16,619,018
Total Cost of Fuel Burned (\$)	_	94,168,474	76,821,208	61,599,953	54,759,306	70,036,739	91,204,010	97,855,419	102,937,287
Less: Fuel Cost Recovered Intersystem Sales (\$)		4,015,368	2,695,032	1,153,830	1,376,104	2,209,755	4,299,543	3,736,771	4,135,519
Total Fuel Costs (\$)	_	90,153,106	74,126,176	60,446,123	53,383,202	67,826,984	86,904,467	94,118,648	98,801,768
Total System KWH Sales Excluding Intersystem Sales		2,151,246,739	1,891,468,049	1,929,566,300	1,644,849,225	1,728,752,892	2,213,936,131	2,361,112,241	2,386,769,726
Fuel Cost Per KWH Sales (\$/KWH)	_	0.041907	0.039190	0.031326	0.032455	0.039235	0.039253	0.039862	0.041396
Less: Base Cost Per KWH included in Rates (\$/KWH)		0.036210	0.036210	0.036210	0.036210	0.036100	0.036100	0.036100	0.036100
Fuel Adjustment Per KWH (\$/KWH)	_	(0.00570)	(0.00298)	0.00488	0.00376	(0.00314)	(0.00315)	(0.00376)	(0.00530)
Unbilled Revenue KWH Sales		2,039,467,770	1,796,372,570	1,839,312,021	1,565,377,996	1,633,122,713	2,098,634,875	2,242,295,666	2,267,076,536
Deferred Fuel Entry (\$)	_	(11,624,966)	(5,353,190)	8,975,843	5,885,821	(5,128,005)	(6,610,700)	(8,431,032)	(12,015,506)
Cumulative Over/(Under) Recovery -December 2009 (\$)		(89,477,296)							
Monthly Carrying Cost Collected (\$)	(1)	(137,521)	(136,121)	(152,508)	(125,540)	(110,743)	(98,176)	(95,288)	(98,344)
Less: Fixed Capacity Charges & Cost Allocation Adj.(\$)	(2)	1,785,357	1,785,357	1,785,357	1,785,357	1,785,357	1,785,357	1,684,470	1,583,583
Company Accounting Adjustments (\$)	(3)		183,552 (A)	19,750,166 (B)	(2,376,102) (C)				
Co.'s Unbilled Fuel Cost Over(Under)Recovery Adj. (\$)	(4)	466,328	500,899	(6,602,927)	(1,143,737)	7,605,539	2,669,806	2,043,507	425,182
ORS Adjustments	(5)				(439,659) (A)				
Cumulative Over/(Under) Recovery (\$)	_	(98,988,098)	(102,007,601)	(78,251,670)	(74,665,530)	(70,513,382)	(72,767,095)	(77,565,438)	(87,670,523)

<sup>\*</sup>Explanations of Adjustments (1) through (5) on Audit Exhibit CLS-6 are included in the testimony of Christina L. Seale.

#### South Carolina Electric & Gas Company Computation of Unbilled Revenue January 2010 - April 2011 Docket No. 2011-2-E

		***************************************	ACTUA			**************************************	ESTIN	IATED	***************************************
		September	October	November	December	January	February	March	April
	_	2010	2010	2010	2010	2011	2011	2011	2011
Fossil Fuel (\$)	_	67,666,582	51,966,751	50,731,708	67,604,994	72,289,000	44,504,000	37,335,000	44,518,000
Nuclear Fuel (\$)		3,087,518	3,524,356	3,413,724	3,526,336	3,246,000	3,145,000	3,490,000	1,683,000
Purchased & Interchange Power Fuel (\$)		7,778,266	616,303	5,415,501	17,574,995	13,206,000	10,484,000	12,026,000	10,678,000
Total Cost of Fuel Burned (\$)	_	78,532,366	56,107,410	59,560,933	88,706,325	88,741,000	58,133,000	52,851,000	56,879,000
Less: Fuel Cost Recovered Intersystem Sales (\$)		2,338,737	1,698,434	2,133,966	4,464,319	3,589,000	2,024,000	957,000	679,000
Total Fuel Costs (\$)	_	76,193,629	54,408,976	57,426,967	84,242,006	85,152,000	56,109,000	51,894,000	56,200,000
Total System KWH Sales Excluding Intersystem Sales		2,226,936,362	1,869,365,704	1,586,809,585	1,919,357,163	2,260,400,000	1,923,000,000	1,776,200,000	1,625,900,000
Fuel Cost Per KWH Sales (\$/KWH)	_	0.034215	0.029106	0.036190	0.043891	0.037671	0.029178	0.029216	0.034565
Less: Base Cost Per KWH Included In Rates (\$/KWH)		0.036100	0.036100	0.036100	0.036100	0.036100	0.036100	0.036100	0.036100
Fuel Adjustment Per KWH	_	0.00189	0.00699	(0.00009)	(0.00779)	(0.00157)	0.00692	0.00688	0.00154
Unbilled Revenue KWH Sales		2,125,816,755	1,786,893,418	1,503,721,501	1,805,688,972	2,147,300,000	1,835,800,000	1,690,500,000	1,546,000,000
Deferred Fuel Entry (\$)	_	4,017,794	12,490,385	(135,335)	(14,066,317)	(3,371,261)	12,703,736	11,630,640	2,380,840
August 2010 - (pg.1 of 2 ) (\$)		(87,670,523)							
Monthly Carrying Cost Collected (\$)	(1)	(92,514)	(75,414)	(85,259)	(105,094)	(108,446)	(99,202)	(83,726)	(80,434)
Less: Fixed Capacity Charges & Cost Allocation Adj.(\$)	(2)	1,583,583	1,583,583	1,583,583	1,583,583	1,583,583	1,583,583	1,583,583	1,583,583
Company Accounting Adjustments (\$)	(3)	22,671 (D)			1,834,540 (E)				
Co.'s Unbilled Fuel Cost Over(Under)Recovery Adj. (\$)	(4)	(4,902,739)	(6,082,107)	2,025,421	9,785,914	(2,558,825)	(7,270,334)	(1,548,159)	(1,420,725)
ORS Adjustments	(5)				691,114 (B)				
Cumulative Over/(Under) Recovery (\$)	_	(87,041,728)	(79,125,281)	(75,736,871)	(76,013,131)	(80,468,080)	(73,550,297)	(61,967,959)	(59,504,695)

<sup>\*</sup>Explanations of Adjustments (1) through (5) on Audit Exhibit CLS-6 are included in the testimony of Christina L. Seale.

Cumulative Over/(Under) Base Fuel Component (\$)	(76,013,131)	(59,504,695)
(per Audit Exhibit CLS-6)		
Cumulative Over/(Under) Environmental Component (\$)	3,180,866	591,944
(per Audit Exhibit CLS-8)		
Net Cumulative Base Fuel and Environmental Components (\$)	(72,832,265)	(58,912,751)
Over/(Under)- Recovery Balances		

Total

South Carolina Electric & Gas Company
Total Environmental Costs
January 2010 - December 2010
Docket No. 2011-2-E

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Month	30°	SO2 Emissions Allowance	owance	NOx Emissions Allowance	lowance	Lime/Limestone	oue Jue	Ammonia		Environmental Costs
		49	%	<b>↔</b>	%	<b>4</b> 5	%	G	%	<b>4</b> 3
Jan-10		584,098	44.12%	874	0.07%	477,415	36.06%	261,455	19.75%	1,323,842
Feb-10		401,672	34.90%	0	0.00%	421,496	36.62%	327,727	28.48%	1,150,895
Mar-10		376,331	29.94%	169	0.01%	522,685	41.59%	357,615	28.46%	1,256,800
Apr-10		418,805	35.26%	0	%00.0	475,319	40.01%	293,814	24.73%	1,187,938
May-10		245,564	34.49%	6,705	0.94%	305,608	42.93%	154,034	21.64%	711,911
Jun-10		320,433	27.16%	6,589	0.81%	548,602	46.49%	301,427	25.54%	1,180,051
Jul-10		338,577	27.31%	7,629	0.62%	571,197	46.08%	322,229	25.99%	1,239,632
Aug-10		372,271	33.63%	8,913	0.80%	456,979	41.28%	268,886	24.29%	1,107,049
Sep-10		515,109	46.62%	9,451	0.86%	384,587	34.80%	195,843	17.72%	1,104,990
Oct-10		250,147	25.20%	0	0.00%	585,676	59.01%	156,725	15.79%	992,548
Nov-10		245,303	25.12%	0	0.00%	468,745	47.99%	262,590	26.89%	976,638
Dec-10		318,726	26.06%	0	0.00%	586,498	47.95%	317,805	25.99%	1,223,029
Totals	s	4,387,036	32.61% \$	\$ 43,330	0.32% \$	5,804,807	43.14% \$	3,220,150	23.93% \$	13,455,323

South Carolina Electric & Gas Company Details of Environmental Costs January 2010 - April 2011 Docket No. 2011-2-E

	Jan-10	Feb-10	Mar-10	Apr-10	Mav-10	0]-uii]	.Inl-10	A110-10
Environmental Costs Incurred	0411-10	100	101	N-Idv	1444	01-110	OTLING	OY-Sny
SO2 Emissions Allowances (\$)	584,098	401,672	376,331	418,805	245,564	320,433	338,577	372,271
NOx Emissions Allowances (\$)	874	0	169	0	6,705	9,589	7,629	8,913
Limestone (\$)	477,415	421,496	522,685	475,319	305,608	548,602	571,197	456,979
Ammonia (\$)	261,455	327,727	357,615	293,814	154,034	301,427	322,229	268,886
Sub-Total(\$)	1,323,842	1,150,895	1,256,800	1,187,938	711,911	1,180,051	1,239,632	1,107,049
Less: Environ. Costs Recovered in Inter-Company Sales (\$)	2,027	443	1,201	2,024	8,101	6,818	4,343	8,669
Net Environmental Costs (\$)	1,321,815	1,150,452	1,255,599	1,185,914	703,810	1,173,233	1,235,289	1,098,380
Retail Allocation Factor of Total Environmental Costs (%)	96.19%	96.19%	96.19%	96.19%	96.19%	96.19%	96.19%	96.19%
Retail Share of Total Environmental Costs (\$)	1,271,454	1,106,620	1,207,761	1,140,731	676,995	1,128,533	1,188,224	1,056,532
Amounts Billed to Retail Customers (\$)	794,991	687,928	695,645	256,666	6,437	(1,809)	(6,056)	(5,628)
Over (Under) Recovery (\$)	(476,463)	(418,692)	(512,116)	(584,065)	(670,558)	(1,130,342)	(1,194,280)	(1,062,160)
Cumulative Over (Under) Recovery - December 2009 (\$)	13,544,222							
Company's Adjustments Over (Under) Recovery (\$)		3,444 (A)						132,824 (B)
Company's Unbilled Fuel Cost Recov Adj. Over (Under) (\$) (7)	5,871	4,044	(85,168)	(265,536)	(2,223)	(2,607)	(473)	1,430
ORS's Adjustments (\$)								
Cumulative Over (Under) Recovery (\$)	13,073,630	12,662,426	12,065,142	11,215,541	10,542,760	9,409,811	8,215,058	7,287,152

<sup>\*</sup> Explanations of Adjustments (6) through (8) on Audit Exhibit CLS-8 are included in the testimony of Christina L. Seale.

South Carolina Electric & Gas Company Details of Environmental Costs January 2010 - April 2011 Docket No. 2011-2-E

		Actual	_ 			Estimated	ted	
Envisormental Costs Incressed	Sep-10	Oct-10	Nov-10	<u>Dec-10</u>	Jan-11	Feb-11	Mar-11	<u>Apr-11</u>
SO2 Emissions Allowances (\$)	515,109	250,147	245,303	318,726	332,092	102,099	80,935	104,420
NOx Emissions Allowances (\$)	9,451	0	0	0	0	0	0	0
Limestone (\$)	384,587	585,676	468,745	586,498	482,119	467,946	111,101	522,426
Ammonia (S)	195,843	156,725	262,590	317,805	137,500	242,289	167,991	285,835
Sub-Total (\$)	1,104,990	992,548	976,638	1,223,029	951,711	812,334	360,027	912,681
Less: Environ. Costs Recovered in Inter-Company Sales (\$)	824	0	200	0	2,197	1,260	640	089
Net Environmental Costs (\$)	1,104,166	992,548	976,438	1,223,029	949,514	811,074	359,387	912,001
Retail Allocation Factor of Total Environmental Costs (%)	96.19%	96.19%	96.19%	96.19%	95.77%	95.77%	95.77%	95.77%
Retail Share of Total Environmental Costs (\$)	1,062,097	954,732	939,236	1,176,431	909,350	776,766	344,185	873,423
Amounts Billed to Retail Customers (\$)	(2,563)	4,907	6,472	(2,744)	(11,585)	(3,926)	2,159	6,412
Over (Under) Recovery (\$)	(1,064,660)	(949,825)	(932,764)	(1,179,175)	(920,935)	(780,692)	(342,026)	(867,011)
Cumulative Over (Under) Recovery August 2010 (\$) (p.1 of 2)	7,287,152							
Company's Adjustments Over (Under) Recovery (\$)	(9)							
Company's Unbilled Fuel Cost Recov Adj. Over (Under) (\$)	3,072	934	(2,616)	(2,639)	(416)	2,473	2,618	317,067
ORS's Adjustments (\$)	(8)			21,387				
Cumulative Over (Under) Recovery (\$)	6,225,564	5,276,673	4,341,293	3,180,866	2,259,515	1,481,296	1,141,888	591,944

<sup>\*</sup> Explanations of Adjustments (6) through (8) on Audit Exhibit CLS-8 are included in the testimony of Christina L. Seale.